



Roof Coatings Manufacturers Association
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May 17, 2005

Mr. Bill Pennington
Project Manager
Energy Efficiency and Demand Analysis Division
California Energy Commission
1516 Ninth Street, MS-35
Sacramento, CA 95814

Re: 2005 Building Energy Efficiency Performance Standards Ban Proven Products That Meet
Mandated Radiative Properties.

Dear Mr. Pennington:

The Roof Coatings Manufacturers Association (RCMA) is the trade association representing the producers of bituminous and non-bituminous (acrylic and elastomeric) roof coatings and cements for use in roofing systems.

Based on recent meetings with Ms. Elaine Hebert at our Technical Committee Meeting in Washington, D.C., we are reiterating our request and urge the CEC to make changes to certain language related to the performance criteria listed in Section 118 of the Title 24 program before they go into effect in October. We had initially felt that removal of Table 118-C Minimum Performance Requirements For Liquid Applied Roof Coatings and all language that address performance requirements, other than those for reflectivity and emissivity, was the most appropriate action for the Commission to stay within its mandated role of setting energy standards. However, as a result of valuable discussions with Ms. Hebert, we offer a compromise that best achieves the goals of the CEC and the Roof Coatings Industry as represented by the RCMA.

As we have stated previously, many standards and codes already exist that address performance of roofing coatings and systems. Although we still firmly believe that adding another dual standard may cause unnecessary duplication and confusion among our industry and our

customers, Ms. Hebert indicated that there was significant work engaged in to establish Table 118-C. Again, we still believe that the removal of Table 118-C is the most appropriate action. However, we offer the following amendments that we believe present the best technical solution to the issue at hand.

Amend Section 118.i.3. to read as follows:

3. **Liquid applied roof coatings applied in the field as the top surface of a roof covering shall meet the requirements of TABLE 118-C or meet the requirements of ASTM C836, C957, D1227, D3468, D4586, D6083, or D6694.**

EXCEPTION 1 to Section 118 (i) 3: Aluminum-pigmented asphalt roof coatings shall meet the requirements of ASTM D2824 or ASTM D6848 and be installed as specified by ASTM D3805.

EXCEPTION 2 to Section 118 (i) 3: PLEASE REVIEW THE INFORMATION IN THIS SECTION. The ASTM procedure listed, ASTM D822 refers to a Carbon Arc method used to test paints and related coatings. Please assure this is the desired method.

EXCEPTION 3 to Section 118 (i) 3: Liquid applied roof coatings that do not comply with the requirements of Table 118-C or the listed ASTM standards must obtain an ICC-ES evaluation report indicating compliance with ICC AC-75 or comply with applicable International Building Code or International Residential Code requirements.

We believe that by including this language within Section 118, it will allow for the use of a variety of established quality liquid applied roof coatings, which will maximize the choices available to end-users in the wide variety of environmental climates found in California. By citing and requiring compliance with known and established ASTM specifications or Table 118-C, it assures that the products selected will be formulated to meet known and field-tested quality standards.

Members of the Roof Coatings Manufacturers Association will be in attendance at the June 7, 2005 CEC hearing and this letter serves as our formal request to have time to address the Commissioners with our comments. We believe this is the most appropriate time for this discussion, however if time will not be made available on June 7th, the RCMA will pursue action to assure a formal audience by the Commission.

We appreciate your consideration of RCMA's position. Please do not hesitate to contact me at (202) 207-1110 if you would like to discuss this in more detail.

Sincerely,



Reed Hitchcock
Executive Director

cc: Elaine Hebert, California Energy Commission